

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HERITAGE REALTY MANAGEMENT, INC.,)	Case No. CA 04 - 333 ERIE
)	
Plaintiff)	Judge Sean McLaughlin
)	
v.)	
)	
JOHN ALLIN d/b/a ALLIN COMPANIES,)	
Defendant)	TRIAL BY JURY OF 12 DEMANDED

AFFIDAVIT OF Christina (Tina) Padilla-Albano

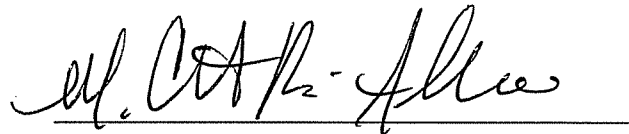
COMMONWEALTH OF PENNSYLVANIA)
) ss.
COUNTY OF ERIE)

1. In 2004, I was employed by Mr. John Allin, d/b/a Snow Management Group.
2. As part of my job duties with Snow Management Group, I participated and engaged in work which was required of Snow Management Group in order to be ready and able to perform the snow and ice removal work under the contract with Heritage Realty Management, Inc.
3. The work which I performed with regard to the Heritage contract included the following:
Data entry of sites into computer database, phone calls made to find additional providers in a given area.

EXHIBIT
D

4. I have carefully reviewed the detailed itemization listing the costs and the time which was expended by Snow Management Group on the Heritage contract. This itemization is attached hereto as Exhibit A. To the best of my knowledge, information and belief, the amount of time and the nature of the work which is identified in this itemization as being work which I performed and time which I spent in connection with the Heritage contract is correct and accurate.

FURTHER THE AFFIANT SAYETH NOT.

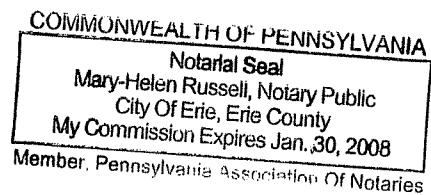
A handwritten signature in cursive script, appearing to read "M. C. H. - Allee", is written over a horizontal line.

COMMONWEALTH OF PENNSYLVANIA)
: SS.
COUNTY OF ERIE)

ON THIS, the 10 day of MAY, 2006, before me a
Notary Public, the undersigned officer, personally appeared CHRISTINA PADILLA ALBANO
known to me (or satisfactorily proven) to be the person whose name is subscribed to the within
instrument, and acknowledged that he/she executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

Mary-Helen Russell



Expense	Date Incurred	Date Paid	Entity Paid	Amount of Expense	Affiliation Allin Co/SMG	COMMENTS
JV Travel expenses						
Brian Marshall Travel expenses						
Peggy Allin - Interviews						
Airfare	8/23/2004		Sun Country Airlines	\$129.10	same	
Hotel	8/23/2004	8/25/2004	Courtyard Minneapolis-St. Paul Airp	\$149.00+Tax	same	
Airfare	8/25/2004		Northwest Airlines	\$364.69	same	
Meals	08/23/04-0825/04	10/18-10/23	various	\$ 25.00 per diem x 3	same	
Airfare	10/18/2004		United Airlines	\$1,037.60	same	
Hotel	10/20/2004	10/20/2004	Comfort Inn - Denver	\$ 64.99 + tax	same	
Hotel	10/21/2004	10/21/2004	Fairfield Inn & Suites - Minn/St. Paul	\$ 82.01 + tax	same	
Taxi	10/22/2004			\$15.00	same	
Hotel	10/22/2004		Radisson Hotel - Des Moines IA	\$ 99.00 + tax	same	
Meals	10/18-10/23	10/18-10/23	various	\$ 25.00 per diem x 6	same	
Erie to Cleveland	10/25/2004	10/25/2004	Anderson Airlin	\$25.00	same	
Cleveland to Chicago	10/25/2004		Continental	\$64.90	same	
Hotel	10/25/2004	10/25/2004	Fairfield Inn Chicago	119.00+tax	same	* Had a \$95.80 ecredit
Ground trans. Cleveland to Erie	10/26/2004		John Allin	unknown	same	personal or company?
Duane Haateja Travel						
Ground Transportation	11/1/2004		ATA	\$181.70	new hire	
Hotel	11/1/2004		(picked up from Pitts. Airport		new hire	PJ Short picked up
training	11/2 - 11/4/04		El Patio Motel	\$ 44.00 x 5 nights	new hire	training @SMG
Bryan Rohe Travel						
Transportation from Cleve - Erie	10/31/2004		ATA/Southwest	\$221.70	new hire	
Hotel	10/31/2004		Anderson Airlin	\$25.00	new hire	trans fr hotel to SMG
training	11/2/04 - 11/4/04			0	new hire	roomed w/ D Dziuban
David Dziuban Travel						
Transportation from Cleve - Erie	10/31/2004		Southwest	\$102.60	new hire	training @ SMG
Hotel	10/31/2004		Anderson Airlin	\$20.00	new hire	
training	11/2/04 - 11/4/04			\$ 44.00 x 5 nights	new hire	trans fr hotel to SMG
Legal Council						
Supplies						
Labels				\$ 135.00	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Business Envelopes				\$ 110.00	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Manilla Envelopes				\$ 65.00	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Paper				\$ 78.00	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Postage				\$ 1,386.75	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Copy Count				\$ 537.50	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Faxing				\$ 125.00	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Personnel						
sites entered in system				\$ 180.00	ops-audit - Beth	4 hours at \$ 45 per
sites entered in system				\$ 180.00	ops-admin - Tina	4 hours at \$ 45 per
phone calls				\$ 1,080.00	ops-audit - Beth	24 hours at \$45 per

phone calls	ops-admin - Linda	1,080.00	24 hours at \$45 per
phone calls	ops-admin - Stacey	1,080.00	24 hours at \$45 per
phone calls	ops-admin - Tina	1,080.00	24 hours at \$45 per
rfp data entry	ops-admin - Linda	360.00	8 hours at \$ 45 per
rfp data entry	ops mgr - L. Edwards	6,175.00	65 hours @ \$ 95 per
Regional Manager-SPs, Site Reviews, Budgeting	rm - Smallwood	3,800.00	40 hours @ \$95 per
Field manager-SPs, Site Reivews	fm - J Casey	760.00	8 hours at \$95 per
Field manager-SPs, Site Reivews	fm - J. terrance	950.00	10 hours at \$95 per
Regional Manager-SPs, Site Reviews, Budgeting	rm - R Hrovat	9,500.00	100 hours at \$95 per
Regional Manager-SPs, Site Reviews, Budgeting	fm - R Santoro	9,500.00	100 hours at \$95 per
Production-Site Visits, Production Maps	prod coord- D. Gallagher	2,375.00	25 hours at \$95 per
Production-Production Maps & Binders	prod - T. Pancura	9,000.00	200 hours at \$45 per
Production-Number Calculations	prod - C. Zelgowski	5,200.00	80 hours at \$65 per
Production-SPs, Field Mangers, Training, Budgeting	prod - R. Rieder	3,800.00	40 hours at \$95 per
Special Accounts Manager-Estimating, Point of Contact Info., Training	sac - B. Marshall	9,500.00	100 hours at \$95 per
Bus. Development	bus devel - J Vernon	33,000.00	200 hours at \$165 per
Bus. Development	bus devel - J Allin	22,500.00	100 hours at \$225 per
Human Resources	h.r. - P Allin	45,000.00	200 hours at \$225 per
Accounting	accounting - M Suleski	1,140.00	12 hours at \$95 per
new hire -field manager	Dave Dziuban - Chicago	9,500.00	100 hours at \$95 per
new hire -field manager	Bryan Fole - Des Moines	9,500.00	100 hours at \$95 per
new hire -field manager	Diane Heataja - Minneapolis	9,500.00	100 hours at \$95 per

Expense	Date Incurred	Date Paid	Entity Paid	Amount of Expense	Affiliation to Allin Co/SMG	COMMENTS
Flight to Ft. Lauderdale-John Allin	1/21/2004	1/21/2004	Northwest Airlines	233.9	same	
Flight to Ft. Lauderdale-Jeff Vernon	1/21/2004	1/21/2004	Northwest Airlines	207.9	same	
Ground Transportation	2/22/2004	2/22/2004			same	
Hotel -JA & JV	2/22/2004	2/22/2004	Harbor Beach Resort & Spa Mariott	\$0	same	\$319.00 paid by Heritage

John Allin		
Date	Tasks	Hours
2/18/2004	Preparation of presentation in FL	10
02/22-02/24/04	Trip to present SMG to Heritage	48
04/15-04/27/04	gather update info from Jeff, Brian, Rudy & Chet	4
06/07-06/09/04	Work with Brian & Jeff to align pricing	8
08/19-08/26/04	Correspondence with SP's in MN to do sites	2
09/30-10/04/04	Review & amend contract & SP Agreement	8
10/8-10/09/04	Review & initial revised contract	2
10/26-10/28/04	Several meetings on training of new FM's & contacting all Property Mgr's	8
10/29-11/04/04	Finalize & approve all FM's responsibilities for all sites & corresponding Property Mgr's	10
		100
Jeff Vernon		
Date	Tasks	Hours
02/16-02/19/04	Preparation of presentation in FL	20
02/22-02/24/04	Trip to present SMG to Heritage	48
5/23/2004	Meeting w/Bob P in Las Vegas - negotiations	2
06/07-06/09/04	Work with John & Brian to align pricing	10
6/16/2004	Trip to Boston w/Mike Smallwood to meet with Bob P	8
9/20/2004	Trip to Rutland, VT to measure site and get SP	16
8/2/2004	Conference Call Heritage/SMG - moving forward	2
08/03-08/05/04	Follow up work from conference call - due diligence	10
10/4-10/09/04	Travel to Erie to work with Production Crew to complete sites, equipment, SP's, maps, etc.	60
10/11-10/15/04	Working on bid sheets, sites, SP's, production, equipment	10
10/21-10/22/04	Meetings in Erie - finalize info for RFPS to go out	4
10/29-11/04/04	Finalize & approve all FM's responsibilities for all sites & corresponding Property Mgr's	10
		200

Expense	AMOUNT	TOTAL
AIRFARE	\$ 129.10	
	\$ 364.69	
	\$ 1,037.60	
	\$ 64.90	
	\$ 181.70	
	\$ 221.70	
	\$ 102.60	\$ 2,102.29
HOTEL	\$ 149.00	
	\$ 64.99	
	\$ 82.01	
	\$ 99.00	
	\$ 220.00	
	\$ 220.00	\$ 835.00
FOOD	\$ 75.00	
	\$ 150.00	
	\$ 125.00	
	\$ 125.00	
	\$ 125.00	\$ 600.00
GROUND	\$ 25.00	
	\$ 20.00	
	\$ 25.00	\$ 70.00
TRANSP. TOTAL	\$ 2,102.29	\$ 3,478.19
LABELS	\$ 135.00	\$ 135.00
ENV	\$ 110.00	
	\$ 65.00	\$ 175.00
PAPER	\$ 78.00	\$ 78.00
POSTAGE	\$ 1,386.75	\$ 1,386.75
COPIES	\$ 537.50	\$ 537.50
FAXING	\$ 125.00	\$ 125.00
SITE DATA ENTRY	\$ 180.00	
	\$ 180.00	\$ 360.00
PHONE CALLS	\$ 1,080.00	
	\$ 1,080.00	
	\$ 1,080.00	
	\$ 1,080.00	\$ 4,320.00
RFP DATA ENTRY	\$ 360.00	
	\$ 6,175.00	\$ 6,535.00
MGMT/PRODUCTION	\$ 3,800.00	
	\$ 760.00	
	\$ 950.00	
	\$ 9,500.00	
	\$ 9,500.00	
	\$ 2,375.00	
	\$ 9,000.00	
	\$ 5,200.00	
	\$ 3,800.00	
	\$ 9,500.00	
	\$ 33,000.00	
	\$ 22,500.00	
	\$ 45,000.00	
	\$ 1,140.00	
	\$ 9,500.00	
	\$ 9,500.00	
	\$ 9,500.00	\$ 184,525.00
SUPPLIES/PERSONNEL TOTAL		\$ 198,177.25
GRAND TOTAL		\$ 201,655.44